

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

CASE NO.: 09-CR-00045-DMC

UNITED STATES OF AMERICA

vs.

MICHAEL BRASSINGTON,

Defendant.

---

AGREED MOTION FOR EXTENSION OF TIME TO FILE POST-TRIAL MOTIONS

COMES NOW the Defendant, Michael Brassington, by and through his undersigned counsel and hereby files this Agreed Motion for Extension of Time to file Post-Trial Motions and in support thereof would show as follows:

1. On November 15, 2010, the jury found the defendant guilty of Counts 1-7, 20, and 21.
2. Post-trial motions in this matter are due on December 15, 2010.
3. Due to scheduling conflicts and the fact undersigned counsel was out of the office for six weeks during trial and is still playing catch up with other matters in the office, the undersigned counsel has been unable to complete the post trial motions in this matter.
4. The Defendant would respectfully request an additional 45 days within which to file his post-trial motions.
5. The undersigned counsel contacted Assistant United States Attorney, Scott McBride, who stated that he had no objection to this request.

6. The undersigned counsel would hereby certify that this request is made in good faith and not for delay nor any improper purpose.

WHEREFORE, the undersigned, in agreement with Assistant United States Attorney, Scott McBride, would respectfully request this Honorable Court enter an order allowing him an additional 45 days within which to file pre-trial motions.

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished, via by electronic transmission via CM/ECF, to SCOTT MCBRIDE, Assistant United States Attorney, Office of the United States Attorney, 970 Broad Street, Suite 700, Newark, New Jersey 07101, this 14<sup>th</sup> day of December, 2010.

Respectfully submitted:

LAW OFFICES OF SALNICK, FUCHS & BERTISCH, P.A.  
One Clearlake Centre, Suite 1203  
250 South Australian Avenue  
West Palm Beach, Florida 33401  
Telephone: (561) 471-1000  
Facsimile: (561) 659-0793

/s/ Michael Salnick

MICHAEL SALNICK, Fla. Bar #270962  
New York Bar # 2007045



SO ORDERED:

DENNIS M. CAVANAUGH, U.S.D.J.

12/14/10